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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)
Chapter 11
(Jointly Administered)

**DECLARATION OF ANDREW BEHLMANN
IN SUPPORT OF *EX PARTE* MOTION OF
SECURITIES PLAINTIFFS PURSUANT TO
B.L.R. 9006-1 REQUESTING ORDER
SHORTENING TIME FOR HEARING ON
SECURITIES PLAINTIFFS'
ADMINISTRATIVE MOTION FOR LEAVE
TO FILE SUR-REPLY**

Related Document: Dkt. 6684

[No hearing requested]

I, Andrew Behlmann, Esq., hereby declare as follows, pursuant to 28 U.S.C. § 1746:

1. I am a Partner of the law firm of Lowenstein Sandler LLP, bankruptcy counsel in these chapter 11 cases of the above-captioned debtors in possession (the “**Debtors**”) to Public Employees Retirement Association of New Mexico, the court-appointed lead plaintiff (“**Lead Plaintiff**”) in the securities class action styled as *In re PG&E Corporation Securities Litigation*,

1 Case No. 3:18-cv-03509-RS, (the “**Securities Litigation**”), pending in the United States District
2 Court for the Northern District of California.

3 2. I submit this Declaration in support of the *Ex Parte Motion of Securities Plaintiffs*
4 *Pursuant to B.L.R. 9006-1 Requesting Order Shortening Time for Hearing on Securities Plaintiffs’*
5 *Administrative Motion for Leave to File Sur-Reply* (the “**Motion to Shorten Time**”), filed
6 contemporaneously herewith.¹ Except as otherwise indicated herein, the facts set forth in this
7 Declaration are based upon my personal knowledge, information provided to me by the Securities
8 Plaintiffs, or based upon my knowledge and belief. I am authorized to submit this Declaration on
9 behalf of the Securities Plaintiffs.

10 3. In the Motion to Shorten Time, the Securities Plaintiffs request that the Administrative
11 Motion be heard on an expedited basis, and that any responses or objections to the Administrative
12 Motion be in writing and filed with the Court and served by 4:00 p.m. (prevailing Pacific Time)
13 on April 9, 2020.

14 4. A hearing on the Standing Motion, to which the Securities Plaintiffs seek to file a Sur-
15 Reply, is currently scheduled for April 14, 2020, at 10:00 a.m. (Prevailing Pacific Time) (the
16 “**Standing Hearing**”).

17 5. Prompt approval of the Administrative Motion is necessary to determine whether the
18 Securities Plaintiffs’ Sur-Reply will be considered in advance of the Standing Hearing and before
19 the Court renders a decision on the Standing Motion.

20 6. No previous request for the relief sought in the Motion to Shorten Time has been made
21 by the Securities Plaintiffs to this or any other court.

22 7. The requested time modification will serve to maintain the current schedule for the
23 case.

24 8. At approximately 10:55 a.m. ET on the date hereof, I contacted the TCC’s counsel,
25 via email, requesting that the TCC stipulate to the proposed shortened time. The TCC’s counsel
26 declined that request. However, cause exists to hear the Administrative Motion on shortened time,

27 ¹ Capitalized terms used but not defined herein have the meanings given to them in the *Securities*
28 *Plaintiffs’ Administrative Motion for Leave to File Sur-Reply* (the “**Administrative Motion**”) or the Motion to Shorten Time, as applicable.

1 as described therein, in the Motion to Shorten Time, and in the related filings.

2 I declare under penalty of perjury that the foregoing statements made by me are true and
3 correct to the best of my knowledge, information, and belief, and I understand that I am subject to
4 punishment if any of the foregoing statements made by me are willfully false.

5
6 Dated: April 7, 2020

/s/ Andrew Behlmann
Andrew Behlmann, Esq.